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Attorneys for United States of America

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION  
12

13 UNITED STATES OF AMERICA,	) NO. CR 19-0222-JD
	)
14 Plaintiff,	) STIPULATED REQUEST AND ORDER TO
	) CONTINUE HEARING DATE AND EXCLUDE
15 v.	) TIME
	)
16 MIN JIN ZHAO,	)
	)
17 Defendant.	)
18 _____	)

19 The parties are scheduled to appear before the Court on January 29, 2020, for a status hearing.  
20 The January 29 hearing was set at the September 12, 2019 status hearing, during which the government  
21 represented that it had a substantial amount of discovery to produce. The Assistant United States  
22 Attorney previously assigned to the matter began preparing the discovery but left the office before it was  
23 ultimately produced. The undersigned government counsel was recently assigned to the case and  
24 anticipates making the next production within one week. In order to permit defense counsel additional  
25 time to review the discovery, the parties respectfully submit the following stipulated request:

- 26 1. The January 29, 2020 status conference shall be continued to March 4, 2020.  
27 2. The time between January 29, 2020, and March 4, 2020, is excluded under the Speedy  
28 Trial Act. Failure to grant the requested continuance would deny defense counsel the reasonable time

STIPULATED REQUEST TO CONTINUE HEARING  
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1 necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C.  
2 § 3161(h)(7)(B)(iv). The ends of justice served by granting the requested continuance outweigh the best  
3 interests of the public and the defendant in a speedy trial and in the prompt disposition of criminal cases.  
4 *See id.* § 3161(h)(7)(A).

5 Dated: January 6, 2020

Respectfully submitted,

6 DAVID L. ANDERSON  
7 UNITED STATES ATTORNEY


8  
9 By: /s/  
10 ALEXIS J. LOEB  
Assistant United States Attorney

11  
12 Dated: January 6, 2020

/s/  
13 DORON WEINBERG  
14 Counsel for Min Jin Zhao

15  
16  
17 IT IS SO ORDERED. The continued status conference will be held at 3:00 p.m. on March 4, 2020.

18 Dated: January 14, 2020

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20   
21 THE HON. JAMES DONATO  
22 United States District Judge  
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